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2                   **IN THE UNITED STATES DISTRICT COURT**  
3                   **FOR THE DISTRICT NEVADA**

4                   CUNG LE, NATHAN QUARRY, JON FITCH,  
5                   BRANDON VERA, LUIS JAVIER  
6                   VAZQUEZ, and KYLE KINGSBURY, On  
7                   Behalf of Themselves and All Others Similarly  
8                   Situated,

9                   Case No. 2:15-cv-01045-RFB-BNW

10                  Plaintiffs,

11                  v.

12                  ZUFFA, LLC, D/B/A ULTIMATE FIGHTING  
13                  CHAMPIONSHIP and UFC,

14                  Defendant.

15                   **PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES,**  
16                   **FOR REIMBURSEMENT OF EXPENSES, AND FOR**  
17                   **SERVICE AWARDS FOR THE CLASS REPRESENTATIVES**

1 Plaintiffs in the action *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*,  
 2 Case No. 2:15-cv-01045 (D. Nev.) (the “Action”), on behalf of themselves and the certified Class,  
 3 hereby move for an order pursuant to Rule 23(h) of the Federal Rules of Civil Procedure:

4       1.     Granting Class Counsel’s request for an award of attorneys’ fees in the amount of  
 5 30.72% of the gross \$375 million *Le v. Zuffa* Settlement Fund (*i.e.*, an award of \$115.2 million) plus  
 6 accrued interest.<sup>1</sup>

7       2.     Granting Class Counsel’s request for reimbursement of their reasonable litigation  
 8 expenses incurred in the prosecution of the Action, totaling \$9,572,685.17.

9       3.     Granting Class Counsel’s request for service awards for the five Class Representatives<sup>2</sup>  
 10 in the amount of \$250,000 for each Class Representative.

11       WHEREFORE, for the reasons set forth in the accompanying memorandum of law, supporting  
 12 Joint Declaration,<sup>3</sup> and all exhibits filed in support of this Motion, Plaintiffs respectfully request that  
 13 the Court grant this motion and enter the proposed Order filed herewith.

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21       1 Unless otherwise defined herein, all capitalized terms have the same meanings set forth in the  
 22 September 26, 2024 Settlement Agreement, attached as Exhibit 1 to the Joint Supplemental Declaration  
 23 of Eric L. Cramer, Richard Koffman, and Joseph R. Saveri in Support of Plaintiffs’ Motion for  
 24 Preliminary Approval of the Settlement (filed on October 7, 2024). *See* ECF Nos. 1045-2 (the  
 declaration), 1045-4 (the Settlement Agreement).

25       2 For clarity, the *Le* Class Representatives are Cung Le, Jon Fitch, Kyle Kingsbury, Brandon Vera, and  
 26 Javier Vazquez. Plaintiff Nathan Quarry was proffered as a class representative for the “Identity Rights  
 27 Class,” which the Court did not certify. *See generally* ECF No. 839 at 75-78.

28       3 The term “Joint Declaration” refers Joint Declaration of Eric L. Cramer, Richard A. Koffman, and  
 Joseph R. Saveri in Support of Plaintiffs’ Motion for an Award of Attorneys’ Fees, for Reimbursement  
 of Expenses, and for Service Awards for the Class Representatives (the “Joint Decl.”), dated December  
 20, 2024, filed concurrently with this motion.

1 Dated: December 20, 2024

Respectfully submitted,

2 /s/ Eric L. Cramer

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